

Exhibit E

From: Lai Yip <LYip@sheppardmullin.com>

Sent: Friday, July 1, 2022 11:01 AM

To: Cassandra.Baloga@lw.com; JKarchmer@idsinc.com; green.a@wssllp.com; Kazim Naqvi <KNaqvi@sheppardmullin.com>; JVaughn@idsinc.com

Cc: wanis@idsinc.com; Kelley.Storey@lw.com; James Salem <JSalem@sheppardmullin.com>; Gabe.Gross@lw.com; Doug.Lumish@lw.com; SKYRYSEMOOG.LWTEAM@lw.com; truitt.a@wssllp.com; Rena Andoh <RAndoh@sheppardmullin.com>; Travis Anderson <TAnderson@sheppardmullin.com>; RFluskey@hodgsonruss.com; MSubjeck@hodgsonruss.com; tflynn@harrisbeach.com; nkhanna@idsinc.com; dwatson@idsinc.com

Subject: RE: Moog v. Skyryse/Protective Order & Inspection Protocol

Counsel for Skyryse,

Currently, our reviewers do not have access to any of the Skyryse devices identified by Jonathan below, including the Skyryse-issued laptops of Pilkington and Kim (E0001, E0027, E0028). Under the protocol, Skyryse is required to “work with iDS to excise [privileged] information from the forensic image[s]” of the devices and have this “be complete such that Authorized Reviewers can commence inspection of these devices” by the date ordered by the Court, which was June 24. That has not occurred.

Jonathan’s team asked on June 21 for Skyryse to address formatting problems relating to the logs for E0001, E0027, E0028 that were provided on June 16. Per his email below, those problems have still not been resolved. Skyryse’s log provided to iDS on June 27 apparently suffered from the same problems as the June 16 log, despite Jonathan’s June 21 email. We would ask that Skyryse address these problems and provide Jonathan his requested information as soon as possible.

Likewise, we would ask that Skyryse confirm as soon as possible that E0002, E0026, and E0029 require no privilege excision. These devices are merely hard drives onto which Skyryse placed its document productions, and therefore should not contain any privileged documents. Providing the confirmation iDS requests should be easy and quick.

Our reviewers are unable to inspect these devices until the above issues are resolved, so we would ask for Skyryse’s prompt attention to this matter.

Regards,

Lai L. Yip

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From: Cassandra.Baloga@lw.com <Cassandra.Baloga@lw.com>

Sent: Thursday, June 30, 2022 7:33 PM

To: JKarchmer@idsinc.com; green.a@wssllp.com; Kazim Naqvi <KNaqvi@sheppardmullin.com>; JVaughn@idsinc.com; Lai Yip <LYip@sheppardmullin.com>

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Subject: RE: Moog v. Skyryse/Protective Order & Inspection Protocol

Hi Jonathan,

Thank you for your email. We are looking into this and will get back to you.

Best,
Cassie

Cassandra Marie Baloga
Pronouns: she/her/hers

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From: Jonathan Karchmer <JKarchmer@idsinc.com>

Sent: Thursday, June 30, 2022 10:23 PM

To: Baloga, Cassandra (NY) <Cassandra.Baloga@lw.com>; green.a@wssllp.com; KNaqvi@sheppardmullin.com; Jim Vaughn <JVaughn@idsinc.com>; LYip@sheppardmullin.com

Cc: Waqas Anis <wanis@idsinc.com>; Storey, Kelley (DC) <Kelley.Storey@lw.com>; JSalem@sheppardmullin.com; Gross, Gabriel (Bay Area) <Gabe.Gross@lw.com>; Lumish, Douglas (Bay Area) <Doug.Lumish@lw.com>; #C-M SKYRYSE - MOOG - LW TEAM <SKYRYSEMOOG.LWTEAM@lw.com>; truitt.a@wssllp.com; RAndoh@sheppardmullin.com; TAnderson@sheppardmullin.com; RFluskey@hodgsonruss.com; MSubjeck@hodgsonruss.com; tflynn@harrisbeach.com; Nitin Khanna <nkhanna@idsinc.com>; Daniel Watson <dwatson@idsinc.com>

Subject: RE: Moog v. Skyryse/Protective Order & Inspection Protocol

Hi Cassie,

Thank you – to confirm my understanding, I want to recap and ask a couple questions - I have summarized in a table below the items we have received and when: the E0002 drive was received on April 1 (not Apr 29) – it contained (1) hard drive image. The E0026 drive was received on April 29 and contained (14) data sources [13 hard drive images and 1 Google export]. The E0029 drive was received on May 5 and contained loose files/folders. We also received 2 Dell laptops and a Mac laptop – so: (6) media items in total per the table below (though E0026 contains multiple data sources/images).

I understand from your email below that the listing you sent on Monday June 27 would have included any privileged items from E0002. I further understand that E0026 does not need to be reviewed for privilege – I just want to reiterate / confirm as this E0026 contains 13 hard drive images plus a Google export: We will prep all data contained on E0026 for review in accordance with your email below unless you indicate otherwise.

We do need some updates to the logs received to date:

- On June 16, you sent a privilege log for emails/attachments and edocs -
 - on an earlier message sent June 8, you said these hashes were from 3 devices (2 Dell laptops and 1 Apple Macbook) – [i.e., E0001, E0027, E0028 below].
- On June 21, I responded to request some changes to the log date/time formatting and had a question re filenames/suffixes.
 - (I do not think we have received a response, if I am incorrect please advise.)
- On June 27, you sent another listing for emails/attachments and edocs.
 - This attachment had similar date/time fields, and filenames/suffixes as the June 16 attachment did.
- When possible: please have the logs reformatted with formatted date/time fields, and confirm the filenames / suffix matter as identified in my June 21 email. (I can provide further detail, please let me know.) Please also have the logs include columns for identifying the source device, and full file/folder paths for all records so we can best identify the items.

The logs received to date I believe refer only to E0001, E0027, E0028 - which is why I wanted to make sure we (re)confirm status of E0002, E0026, and E0029. Not trying to be redundant – but given the number of data sources received to date, and because the listings received refer to mainly email and/or 3-4 of the 6 data sources we received – I just want to make sure we are not missing anything, and that my understanding is accurate. If logs can identify all source devices and file/folder paths: this would help clarify.

I hope the recap / summary was helpful, if I've missed anything or if you have questions please advise. Thanks.

IDS EID	Date Received	Data Source	CustodianName	Media Label	From	Custodian/GeneralNo
E0001	4/1/2022	Laptop	Misook Kim	MOOOG-04208.E0001	Skyryse	from Skyryse No Cable Received it on 04/01/2022 AT: 0413

E0002	4/1/2022	Ext. HD	Alin Pilkington	MOOOG-04208.E0002	Skyryse	from Skyryse in a box with cable Received it on 04/01/2022 2 TB This Ext HD contains 1 forensic image
E0026	4/29/2022	Ext. HD	(various) Images	MOOOG-04208.E0026	Skyryse	Received it on 04/29/2022. This Ext contains 14 data sources – (13 hard drive images and 1 Google Export)
E0027	4/9/2022	Laptop	Alin Pilkington	MOOOG-04208.E0027	Skyryse	Received it on 04/29/2022 No charger AT: 0421
E0028	4/9/2022	Laptop	Alin Pilkington	MOOOG-04208.E0028	Skyryse	Received it on 04/29/2022 No charger AT: 0462
E0029	5/5/2022	Ext. HD	TBD	MOOOG-04208.E0029	Skyryse	Received it on 05/05/2022 Loose files/folders

Jonathan Karchmer

Manager of Forensics

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